

RECEIVED
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIVIAN ANN HILL

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Citibank.com

See the list of defendants

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

United States Constitution the 1st Amendment

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Five Million Dollars

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>1/13/2023</u>		<u>Steven A. Hill</u>
Dated		Plaintiff's Signature
<u>Vivian</u>	<u>A.</u>	<u>Hill</u>
First Name	Middle Initial	Last Name
<u>140 CLAREMONT Avenue #1K</u>		
Street Address		
<u>(Manhattan) New York, New York</u>		<u>10027</u>
County, City	State	Zip Code
<u>(cell#) 917-318-4236</u>	<u>vivianhill13@yahoo.com</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of _____
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

VIVIAN A. Hill
First Name Middle Initial Last Name

140 CLAREMONT Avenue #1K
Street Address

(Manhattan) New York, New York 10027-4663
County, City State Zip Code

(cell) 917-318-4236 vivianhill13@yahoo.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: LUCIA Rodriguez
 First Name Last Name
Citibank Branch Manager (NMLS #2287046)
 Current Job Title (or other identifying information)
1310 Amsterdam Avenue
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10027
 County, City State Zip Code

Defendant 2: MANUEL URENA
 First Name Last Name
Citibank/Teller
 Current Job Title (or other identifying information)
2861 Broadway + 111 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10025
 County, City State Zip Code

Defendant 3: Jacky Liang
 First Name Last Name
Personal Banker (NMLS ID #2264704 (Citibank))
 Current Job Title (or other identifying information)
2861 Broadway + 111 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10025
 County, City State Zip Code

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: NING
 First Name Last Name
Citibank / Branch Manager (NMLS ID #1672580)
 Current Job Title (or other identifying information)
2861 Broadway + 111 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10025
 County, City State Zip Code

Defendant 2: MILA Lipeyko-Suarez
 First Name Last Name
Citibank / Teller
 Current Job Title (or other identifying information)
2861 Broadway + 111 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10025
 County, City State Zip Code

Defendant 3: AISSATA DIALLO
 First Name Last Name
Citibank / Teller
 Current Job Title (or other identifying information)
2861 Broadway + 111 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10025
 County, City State Zip Code

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Aneta Singh
 First Name Last Name NMLS #
Citibank Assistant Branch Manager 722792
 Current Job Title (or other identifying information)
2350 Broadway + 86 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10024
 County, City State Zip Code

Defendant 2: Sahara Robles
 First Name Last Name
Citibank Teller
 Current Job Title (or other identifying information)
2350 Broadway + 86th Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10024
 County, City State Zip Code

Defendant 3: Fitzgerald Valdez
 First Name Last Name
Citibank Branch Manager NMLS # 727396
 Current Job Title (or other identifying information)
2350 Broadway + 86th Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10024
 County, City State Zip Code

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Tevin Rheubottom
 First Name Last Name
Citibank / Branch Manager nmls ID # 1845940
 Current Job Title (or other identifying information)
201 West 125 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10027
 County, City State Zip Code

Defendant 2: Shanija Russell
 First Name Last Name
Citibank / Teller
 Current Job Title (or other identifying information)
201 West 125 Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10027
 County, City State Zip Code

Defendant 3: Lindi Hunt
 First Name Last Name
Citibank / Teller
 Current Job Title (or other identifying information)
2350 Broadway + 86th Street
 Current Work Address (or other address where defendant may be served)
(Manhattan) New York, New York 10024
 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See the Attachment statements

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>1/13/2023</u>		<u>Stevan A. Hill</u>
Dated		Plaintiff's Signature
<u>Vivian</u>	<u>A.</u>	<u>Hill</u>
First Name	Middle Initial	Last Name
<u>140 CLAREMONT Avenue #1K</u>		
Street Address		
<u>(Manhattan) New York, New York</u>		<u>10027</u>
County, City	State	Zip Code
<u>(cell#) 917-318-4236</u>	<u>vivianhill3@yahoo.com</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

12/23/2022

In the A.M. EST I proceeded to Citibank, Morningside Gardens branch in order to purchase an money order from a teller. I went to Nicole (teller) and I requested an money order from her. Lucia Rodriguez / Branch Manager was standing behind Nicole. This manager abruptly told me that my request would not be granted because I was rude to the other employees at this branch. I in turn did not challenge the obviously irate manager and I left this branch.

I emphatically will not allow this manager to utter falsehoods about me. This marks the third incident which involves this branch leader. She has denied me an essential service therefore I was highly inconvenienced and thus I sought out another Citibank branch to complete charitable requisite banking business. I went to Citibank 111 St. + Broadway (Manhattan) and purchased two money orders for City Harvest.

Exhibit #1



Lucia Rodriguez
Branch Manager
NMLS #2287046

Citibank, N.A.
1310 Amsterdam Avenue
New York, NY 10027
T +1 212 663 2249
T +1 800 627 3999
lucia.rodriquezpichardo@citi.com



Exhibit #1

12/23/2022

I went to the Citibank branch (00029) at 111 St. + Broadway to complete charitable banking business. As I proceeded to a female teller and requested an Andrew Jackson in the form of a money order. She stated another United States President's name. I repeated my same request. She gave me the \$20.00 money order and the transaction receipt which one can see does not list the money order fee. After partially filling out the money order to City Harvest, Org. I went to be served by Manuel Teller as I have previously observed on his name tag. I requested an additional money order which I said an Abraham Lincoln. He intentionally stated other U.S. Presidents. I said to him "You do understand my initial request" and I noted that he just sneered at me. Then he asked me if I had any further requests. I then said I wanted five George Washingtons for Hanukkah. He followed up and again tried to belittle me as well as confuse me. I told him "you are not that slick" Promptly, I took the ^{1st} transaction receipt off the counter. I noted ^ that he placed another transaction receipt on the counter as I began walking away. Jacky (another Banker) summoned NING (Branch Manager for me. I was promptly assisted by this Manager and I told him I just encountered a case of racism.

See
Exhibit # 2

Transaction Receipt

FA Branch Card Number Dec 23,22
 103 (00029)Broadway & 111th St ends in 598 11:31AM
 Transaction Amount Description
 Withdrawal \$5.00 From Checking
 On deposit \$4,653.65 xxxxxxxx143
 Available now \$4,653.65 ref 022-02 PIC
 Money Order \$5.00 CHK# 121745188
 ref 022-02 PIC

Please consult a Citibank Associate or your Client Manual for a description of the Bank's policy concerning placing a stop payment request on this instrument and the fee associated with that request.

VIVIAN HILL

Thank you for banking with Citibank.

citibank®

Transaction Receipt

FA Branch Card Number Dec 23,22
 081 (00029)Broadway & 111th St ends in 598 11:19AM
 Transaction Amount Description
 Withdrawal \$20.00 From Checking
 On deposit \$4,658.65 xxxxxxxx143
 Available now \$4,658.65 ref 010-02 PIC
 Money Order \$20.00 CHK# 121759265
 ref 010-02 PIC

Please consult a Citibank Associate or your Client Manual for a description of the Bank's policy concerning placing a stop payment request on this instrument and the fee associated with that request.

VIVIAN HILL

Thank you for banking with Citibank.

citibank®

Citibank



NING

Branch Manager

Vice President

We're Now on Zoom!

NMLS ID: 1672580

Financial Center 029 Broadway 111th

2861 Broadway

New York, NY 10025

T +1 212 666 6496

T +1 800 627 3999

sihang.ning@citi.com

Citibank, N.A.

Exhibit #2

On 12//28//2022 pm EST I proceeded to the 86th street & broadway Citibank branch in manhattan During the process of being serviced by Sahara Robles/teller she curtly addressed me after my request. I requested twenty Andrew Jacksons and eight George Washingtons in coins. She directed me to insert my debit card in the designated card holder and I did punch my pin code in. I noticed that she wrote on slip of paper of \$108.00. she became openly insipid when I said I did not asked that amount of money. Then she ask me to repeat my request in an effort to confuse me. I said "You tell me what I said". At this point I raised my voice several octaves and said several times "you cheated". Aneta Singh/Assistant Branch Manager directed me into a enclosed office and she told me not to accuse said teller of cheating. I asked Ms. Singh where were the two black tellers that I previously observed at this site. She told me that they took the day off. Citibank business cards were requested by me pertaining to Ms. Robles and Ms. Singh and I received them from A. Singh. I left this branch without completing any further monetary transactions.

Please investigate the above sequence events for I am highly displeased.

Vivian A. Hill
140 Claremont Avenue Apt.#1K
New York, New York 10027

vivianhill3@yahoo.com

*See
Exhibit #3*



SAHARA ROBLES
Concierge Banker

2350 Broadway
Broadway & 86th St.
New York, NY 10024
T 212 875 0164
Sahara.robles@citi.com



Exhibit #3A

Citibank



Nicole Lahoz
Concierge

Citibank, N.A.
1310 Amsterdam Avenue
New York, NY 10027
T 212 895 9705
T 800 627 3999
nicole.lahoz@citi.com

ANETA SINGH
Assistant Branch Manager
NMLS ID: 722792

Citibank, N.A.
2350 Broadway
New York, NY 10024
T 212 873 7953
T 800 627 3999
aneta.singh@citi.com



Mortgage



Peter Schleider
Home Lending Officer
Distributed Retail Sales
NMLS ID: 41331

Citibank, N.A.
399 Park Avenue
New York, NY 10022
T 917 903 9874
F 833 355 2115
peter.schleider@citi.com



Citibank



Tevin Rheubottom
Branch Manager
NMLS ID: 1845940

Citibank, N.A.
201 West 125th Street
New York, NY 10027
T 212 932 3012
Tevin.Rheubottom@Citi.com



Exhibit #3 B

Compliant #5

I went to the 111 street Citibank, Inc. branch to obtain \$20.00 from my savings account for the culmination of the Hanakkah celebration. At said branch I partially relied on the ATM machine to obtain this same money. After viewing Jackie/banker at the customer service counter I then proceeded to this main area and patiently waited for Jackie to attend to me. I told him I did not trust Manuel given what I experienced with him yesterday. Jackie direct me to have a dark skinned female teller service me. At her station I requested that she provide me with twenty George Washingtons in exchange for a \$20.00 bill. She provided me with seemingly new one dollar bills. As I manually double checked the accuracy of the count of these bills she observed that my hands were very tremulous. She checked the bill count after me putting money in four portions to equal 20 dollars. During the conversation with her I told her to stop being condescending. She did not ask me for an identification check, however I insisted on an ID check and inserted my debit card in the designated machine slot. I simultaneously told her that I had an identity theft case that is currently ongoing. I also presented my NYS driver's license and as stated my Citibank debit to her. Though she indicated that I am a well known client that did not suffice a requisite ID check. I did enumerate a number of tellers that I wondered if she was familiar with and she thus told me no. Before leaving this bank I asked her if the said bank will be open on monday I was told "yes." After going to Westside Market East across the street and seeing the Hispanic employees congregating at the entrance I went back the same branch and queried Jackie if in fact this branch would be open on monday and he responded he thought so.

Please note that I question this female teller's integrity therefore please investigate my concern.

Exhibit #4

Citibank



NING
Branch Manager
Vice President
We're Now on Zoom!
NMLS ID: 1672580

Financial Center 029 Broadway 111th
2861 Broadway
New York, NY 10025
T +1 212 666 6496
T +1 800 627 3999
sinang.ning@citi.com

Citibank, N.A.

Citibank



Jacky Liang
Personal Banker
We're Now on Zoom!
NMLS ID: 2264704

Citibank, N.A.
Financial Center 029 Broadway 111th
2861 Broadway
New York, NY 10025
T +1 212 663 1923
T +1 800 627 3999
jacky.liang@citi.com

Citibank



MILA LIPEYKO-SUAREZ
Concierge Banker
We're Now on Zoom!

Citibank, N.A.
Financial Center 029 Broadway 111th
2861 Broadway
New York, NY 10025
T +1 646 434 0374
T +1 800 627 3999
miriam.lipeykosuarez@citi.com

Citibank



MANUEL A. URENA
Concierge
We're Now on Zoom!

Citibank, N.A.
Financial Center 029 Broadway 111th
2861 Broadway
New York, NY 10025
T +1 646 434 0374
T +1 800 627 3999
manuel.adriano.urenahernandez@citi.com

Citibank



AISSATA DIALLO
Concierge
We're Now on Zoom!

Citibank, N.A.
Financial Center 029 Broadway 111th
2861 Broadway
New York, NY 10025
T +1 646 434 0374
T +1 800 627 3999
aissata.diallo@citi.com

Lucia Rodriguez
Branch Manager
NMLS #2287046

Citibank, N.A.
1310 Amsterdam Avenue
New York, NY 10027
T +1 212 663 2249
T +1 800 627 3999
lucia.rodriguezpichardo@citi.com

Exhibit #4

On 12//292022 I went to the 125th street & 7th Avenue Citibank branch to obtain money for offerings and Say Dour's service payment. Say Dour is the interim superintendent at 140 Claremont Avenue. At a teller booth a dark skinned female listened while I requested one Alexander Hamilton bill and six George Washingtons in coins. I proceeded to watch her take large amount of coins offa nearby file cabinet. She continued to sternly look at me. Tevin Rheubottom// Branch Manager observed her not satisfying my request. After several minutes he came over and assisted with the transaction.

I know I repeated that I wanted, one Alexander Hamilton bill and six George Washingtons in coins. I was given this amount of money with his assistance. After leaving said female's booth he asked me if that is what I needed. I said "Yes." I then changed my mind and the withdrawal was deposited, and \$11.25 was withdrawn. Please see the attached transaction receipts and the corresponding business cards.

I do request an investigation of the above for this female rigorously tried to confuse me.

Regards.

Vivian A. Hill
140 Claremont Avenue #1K
New York, New York
10027-4663

vivianhill3@yahoo.com

See
Exhibit # 5

Transaction Receipt
 FA Branch Card Number Dec 29, 22
 024 (00926) West 125th Street ends in 598 05:25PM
 Transaction Amount Description
 Deposit \$11.50 To Checking xxxxxxxx143
 On deposit \$4,487.10 ref 054-02 PIC
 Available now \$4,487.10
 Withdrawal \$11.25 From Checking
 On deposit \$4,475.85 xxxxxxxx143
 Available now \$4,475.85 ref 054-03 PIC

1- Alexander Hamilton - Say Down

Swire Cell payment

Klamazae Offings George Washington

for 5 Temples

Cash

\$11.25 To VIVIAN HILL

Thank you for banking with Citibank®

Transaction Receipt
 FA Branch Card Number Dec 29, 22
 024 (00926) West 125th Street ends in 598 05:06PM
 Transaction Amount Description
 Withdrawal \$11.50 From Checking xxxxxxxx143
 On deposit \$4,475.60
 Available now \$4,475.60 ref 052-02 PIC

Cash

\$11.50 To VIVIAN HILL

Thank you for banking with Citibank®

Exhibit 5

On 12//30/2022 to the 125th street & 7th avenue branch in order to purchase a money order. I approached the dark skinned female teller in the middle booth and was serviced by her after I verbalized my request. I uttered one Benjamin Franklin (\$100) from my savings account She followed up and said there would be a five dollar service charge. I said an Abraham Lincoln.

After giving me the money order she signaled to me to sign for the withdrawal from my savings account. I instantly questioned my savings account balance on this transaction slip copy and I then put two question marks next to the listed savings account balances that were printed on said slip. I then went to the customer counter and filled out the money order, put it in a manila envelope, and vacated this branch.
Is it policy to sign for withdrawals?

Vivian A. Hill
140 Claremont Avenue Apt. #1K
New York, New York
!0027-4663

vivianhill3@yahoo.com

*See
Exhibit #6*



125th Street Branch
Citibank N.A.
Retail Branch
Mon - Fri 9:00am - 5:00pm
Sat: 10:00am - 2:00pm

Citibank 125th Street
201 West 125th Street
New York, NY 10027
T 212 822 6847

Citibank



Tevin Rheubottom
Branch Manager
NMLS ID: 1845940

Citibank, N.A.
201 West 125th Street
New York, NY 10027
T 212 932 3012
Tevin.Rheubottom@Citi.com

Transaction Receipt

FA Branch 029 (00926) West 125th Street Card Number Dec 30, 22

Transaction Amount \$100.00 From Citi Savings ends in 598 09:41AM

Withdrawal \$5,057.67 From Citi Savings xxxxxx492

On deposit \$5,057.67 ref 006-02 PIC

Available now \$5.00 From Citi Savings xxxxxx492

Withdrawal \$5,057.67 ref 006-02 PIC

On deposit \$5,057.67 ref 006-02 PIC

Available now \$100.00 CHK# 121763216

Money Order \$5.00 ref 006-02 PIC

Money Order Fee \$5.00 ref 006-02 PIC
Please consult a Citibank Associate or your Client Manual
for a description of the Bank's policy concerning placing
a stop payment request on this instrument and the fee
associated with that request.

VIVIAN HILL

Thank you for banking with Citibank

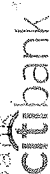


Exhibit # 6